

REMARKS

The present application was filed on March 26, 2001 with claims 1-25. In the outstanding Office Action, the Examiner rejects claims 1-5, 7-9, 12-16, 20, 21 and 23-25 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,852,803 to Ashby, III et al. (hereinafter "Ashby") in view of U.S. Patent No. 6,453,281 to Walters et al. (hereinafter "Walters") in further view of U.S. Patent No. 6,366,886 to Dragosh et al. (hereinafter "Dragosh").

In this response, Applicants amend independent claims 1, 12, 21 and 25.

Claims 1, 12, 21 and 25 have been amended to recite that the computing device that performs the speech-to-text conversion archives electronically-readable identifiers and associated text-converted spoken utterances on a removable storage medium such that an archived mapping is created over time between items having electronically-readable identifiers and text-converted spoken utterances that are representative of user descriptions of the items wherein the archived mapping is specific to the user and is removably-portable and represents items that the user may interact with at a future time or place (the added language is underlined for clarity). This language is illustratively supported in the present specification at page 10, lines 4-8, and in the description of FIG. 4 at page 10, lines 9-28.

By way of example only, in the context of a consumer goods (e.g., grocery products) that a user may normally purchase (at a grocery store), it is to be understood that such a removably-portable, user-specific mapping of identifiers (e.g., UPCs) to text-converted product descriptions can advantageously serve the user in the future by allowing him/her to have a readily-accessible source of product descriptions (generated by him/her) that can be carried to any grocery store that may include a kiosk that allows the user to insert his archived mapping, scan a product in the store, and obtain a product description of the item if the item is part of his/her archived mapping.

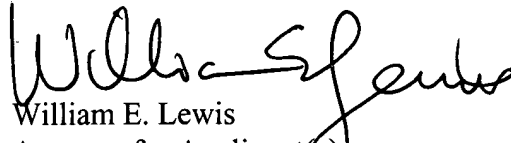
The Ashby//Walters/Dragosh combination fails to teach or suggest at least the above limitations. No where does the combination disclose that the computing device that performs the speech-to-text conversion archives electronically-readable identifiers and associated text-converted spoken utterances on a removable storage medium such that an archived mapping is created over time between items having electronically-readable identifiers and text-converted spoken utterances that are representative of user descriptions of the items wherein the archived mapping is specific to

the user and is removably-portable and represents items that the user may interact with at a future time or place, as in the claimed invention. Dragosh was introduced by the Examiner to disclose remote speech recognition, but no where does Dragosh suggest the creation of a removably-portable, user-specific mapping, as in the claimed invention.

Furthermore, Applicants' assert that any combination between Ashby and Dragosh clearly lacks legally-sufficient motivation under the Federal Circuit requirements of In re Lee, 277 F.3d 1338, 1343 (Fed. Cir. 2002), as explained in Applicants' previous responses and incorporated by reference herein.

In view of the above, Applicants believe that claims 1-5, 7-9, 12-16, 20, 21 and 23-25 are in condition for allowance, and respectfully request withdrawal of the various §103 rejections.

Respectfully submitted,



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